

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

No. 4:25-MJ-451

DANIEL ROLANDO SANCHEZ ESTRADA (01)

JOINT MOTION TO CONTINUE TIME TO INDICT

The government and the defendant's attorney jointly request this Honorable Court to continue the time upon which an indictment must be filed in this case for 31 days, from August 11, 2025, until September 11, 2025.¹

- (1) On July 7, 2025, the government obtained a criminal complaint against the defendant, alleging violations of 18 U.S.C. § 1512(c)(1) and (k).
- (2) The defendant was arrested on July 6, 2025, and first appeared before the Court on July 7, 2025. On July 10, 2025, the defendant appeared again for his probable cause and detention hearings. The defendant conditionally waived his detention and the Court, after a hearing, found the complaint was supported by probable cause.
- (3) Under the Speedy Trial Act, 18 U.S.C. § 3161(b), an indictment must be returned on the instant charge "within thirty days from the date on which [the defendant] was arrested or served with a summons in connection with such charges." The 30th day in this case will fall on or about August 11,

¹ A defendant's "personal consent is not required" when the defendant's attorney is seeking a Speedy Trial Act continuance, including when it is a continuance of the indictment deadline under the Speedy Trial Act. *United States v. Robinson*, 67 F.4th 742, 749 (5th Cir. 2023).

2025, estimating any excludable delay under 18 U.S.C. § 3161(h)(1) and Federal Rule 45(a).

- (4) The parties request that the Court continue presentation of the defendant's case to the grand jury for an additional 31 days because both parties believe that the case may be resolved pre-indictment. The additional time is necessary for the parties to exchange information about the defendant and the case and for the government to disclose sufficient discovery to the defense to permit a thorough review and evaluation of the case against the defendant. If the government is able to provide defense early access to this discovery, these efforts may relieve the government of presenting the case to the grand jury, which will preserve both judicial and government resources and give the defense attorney time to digest the case and meaningfully negotiate terms of a potential guilty plea.
- (5) The granting of this continuance, therefore, would be in the interest of judicial economy. Both parties likewise believe that a continuance would serve the ends of justice and would outweigh the interest of the public in a speedy trial. *See* 18 U.S.C. § 3161(h)(7)(A).
- (6) This request is not made in effort to unduly delay the proceedings, but to permit the parties sufficient time for effective preparation, taking into account the exercise of due diligence. *See* 18 U.S.C. § 3161(h)(7)(B)(iv).

(7) For the foregoing reasons, the parties request that this Honorable Court continue the time upon which an indictment must be filed for an additional 31 days, until on or about September 11, 2025.

Respectfully submitted,

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7/16/25
DATE